

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRONTIER AIRLINES, INC.

Civil Action No.: 1:20-cv-09713-LLS

Plaintiff,

-against-

AMCK AVIATION HOLDINGS IRELAND
LIMITED, ACCIPITER INVESTMENT 4
LIMITED, VERMILLION AVIATION
(TWO) LIMITED, WELLS FARGO TRUST
COMPANY, N.A., solely in its capacity as
OWNER TRUSTEE, and UMB BANK,
N.A., solely in its capacity as OWNER
TRUSTEE,

Defendants.

NOTICE OF MOTION OF SARAH E. MOLINOFF TO WITHDRAW AS COUNSEL

PLEASE TAKE NOTICE that, upon the accompanying declaration, Sarah E. Molinoff will move this Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on a day and time to be determined by the Court, pursuant to this Court's Local

Civil Rule 1.4, for leave to withdraw as counsel for Plaintiff Frontier Airlines, Inc. ("Plaintiff").

Lane Powell PC will continue to represent Plaintiff in this proceeding.

DATED: October 26, 2021
Portland, OR

LANE POWELL PC

By: /s/ Sarah E. Molinoff

David G. Hosenpud (*pro hac vice*)
Sarah E. Molinoff, NY Bar No. 5439773
601 SW Second Avenue, Suite 2100
Portland, Oregon 97204-3158
Telephone No.: 503.778.2100
Facsimile No.: 503.778.2200
Email: hosenpudd@lanepowell.com
Email: molinoffs@lanepowell.com
-and-

BINDER & SCHWARTZ LLP

Neil S. Binder
366 Madison Avenue, 6th Floor
New York, New York 10017
Telephone No.: 212.510.7008
Facsimile No.: 212.510.7299
Email: nbinder@binderschwartz.com

Attorneys for Plaintiff, Frontier Airlines, Inc.